



## INDIANA STATE BOARD OF ANIMAL HEALTH

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Office of the State Veterinarian  
805 Beachway Drive, Suite 50  
Indianapolis, IN 46224-7785  
Phone: 317/227-0300  
Fax: 317/227-0330

Regulatory Analysis and Development  
PPD, APHIS  
Station 3C71  
4700 River Road Unit 118  
Riverdale, MD 20737-1238

Re: Docket No. 05-015-1, National Animal Identification System; Notice of Availability of a Draft Strategic Plan and Draft Program Standards

The Indiana State Board of Animal Health has a charge for “general supervision of the prevention, suppression, control and eradication of infectious, contagious and communicable diseases affecting the health of animals.” We have three primary missions of animal health, food safety and emergency preparedness. With our charge and missions in mind, we provide the following comments to the questions posted by APHIS.

The Draft Strategic Plan calls for making the entire system mandatory by January 2009. Is a mandatory identification program necessary to achieve a successful animal disease surveillance, monitoring, and response system to support Federal animal health programs? Please explain why or why not.

**Premise and animal identification must be mandatory and regulated by USDA and the states. These two systems should be consistent with animal identification connected to premise identification. Record keeping should also be mandatory. Within their industries, producers may voluntarily report their records for marketing advantages. Establishment and maintenance of animal movement records should be required but do not need to be reported to USDA or the states unless the information is needed for an authorized federal or state purpose. A general requirement to report all movements/commingling is a monumental logistical and resource challenge that may not be necessary to accomplish NAIS objectives.**

**USDA should consider the model for record keeping provided by the US Food and Drug Administration final rule on establishment and maintenance of records under the Public Health Security and Bioterrorism Preparedness and Response Act of 2002 (21 CFR Parts 1 and 11). This model requires the establishment and maintenance of records designed to allow traceability of food, including government access to the records within 24 hours of request, without reporting each movement of food. The Bioterrorism rules do require reporting prior to imports moving into the country (21 CFR Subpart I) but not each movement within the country.**

In the current Draft Strategic Plan, the NAIS would require that producers be responsible for having their animals identified before the animals move to a premise where they are to be

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commingled with other animals, such as a sale barn. At what point and how should compliance be ensured? For example, should market managers, fair managers, etc., be responsible for ensuring compliance with this requirement before animals are unloaded at their facility or event? Please give the reasons for your response.

**Compliance needs to be ensured by locations receiving animals. USDA and the state agencies do not have enough resources to be “patrolling” this program. Marketing managers should either reject animals without identification or have the ability to tag them. Movements accompanied by a Certificate of Veterinary Inspection (CVI) should have the associated National Premise Identification Number for the premises of origin and destination recorded on the CVI.**

In regard to cattle, individual identification would be achieved with an AIN tag that would be attached to the animal's left ear. It is acknowledged that some producers do not have the facilities to tag their animals; thus, the Draft Program Standards document contains an option for tagging sites, which are authorized premises where owners or persons responsible for cattle could have the cattle sent to have AIN tags applied. Do you think this is a viable option, i.e., can markets or other locations successfully provide this service to producers who are unable to tag their cattle at their farms? Please give the reasons for your response.

**The program must support needs of all industries and producers. Some producers do not have the facilities for tagging animals, while others cannot identify animals for religious reasons. We need to be cognizant of these concerns.**

The current Draft Strategic Plan does not specify how compliance with identification and movement reporting requirements will be achieved when the sale is direct between a buyer and seller (or through their agents). In what manner should compliance with these requirements be achieved? Who should be responsible for meeting these requirements? How can these types of transactions be inputted into the NAIS to obtain the necessary information in the least costly, most efficient manner?

**All producers should be required to maintain records of all animal sales and purchases as a part of the NAIS requirements. However, we do not feel this information needs to be reported to the NAIS database. Producers or their agents should keep these records. The NAIS system should require that USDA and states have access to all records, including those kept by producers and their agents, needed to carry out public mandates.**

USDA suggests that animals should be identified anytime prior to entering commerce or being commingled with animals from other premises. Is this recommendation adequate to achieve timely traceback capabilities to support animal health programs or should a timeframe (age limit) for identifying the animals be considered? Please give the reasons for your response.

**In the state of Indiana, premise identification will be mandatory on September 1, 2006. When the identification of animals is mentioned, we feel identification should not be mandated or required until the animals leave the premise and/or are commingled.**

Are the timelines for implementing the NAIS, as discussed in the Draft Strategic Plan, realistic, too aggressive (i.e., allow too little time), or not aggressive enough (i.e., do not ensure that the NAIS will be implemented in a timely manner)? Please give the reasons for your response.

**The timelines are achievable depending on the resources (i.e. money, time, people) from USDA. We agree that premise and animal identification need to become mandatory and agree with the timelines. However, we disagree with the 2009 timeline because of insufficient resources, and we do not support mandated report of movement records at this time. We do support recording and maintaining animal movement records by individual producers.**

Should requirements for all species be implemented within the same timelines, or should some flexibility be allowed? Please give the reasons for your response.

**A concentrated effort should be placed on completing the timeline for cattle, swine, sheep, goats and cervids. Because of the recent formation of working groups for equine and poultry, their industries should be allowed more time for completion.**

What are the most cost-effective and efficient ways for submitting information to the database (entered via the Internet, file transfer from a herd-management computer system, mail, phone, third party submission of data)? Does the type of entity (e.g., producer, market, slaughterhouse), the size of the entity, or other factors make some methods for information submission more or less practical, costly, or efficient? Please provide supporting information if possible.

**Premise reporting should be handled through the state agencies, which can decide the best method of submission for their constituents. Allocation of AINs can be completed by AIN managers in the method best suited to their producer base. However, state agencies need to be provided with an electronic report of numbers allocated within the state. Our recommendation would be not to require reporting of animal movements for NAIS. The state agencies should be allowed to maintain the databases for the disease programs they administer; USDA would then have access to these databases.**

We are aware that many producers are concerned about the confidentiality of the information collected in the NAIS. Given the information identified in the draft documents, what specific information do you believe should be protected from disclosure and why?

**Section I.B. of the draft program standards lists four events that would trigger state or federal access to the NAIS data. This list is too restrictive for state animal health authorities.**

**The Indiana State Board of Animal Health partners with USDA. Our two agencies need to share information without restrictions. There are also other reasons or circumstances that would require access to the information in the database. Examples of these authorized state purposes are disaster planning, disaster recovery and theft of animals. Confidentiality should not mean state agencies cannot have access to the information for state programs.**

**States are the primary gatherers of NAIS information. If state agencies cannot have access to the information for their needs, states will be required to duplicate the system, which is a poor use of resources. By making NAIS information a part of daily operations, states will help assure the information is update and accurate.**

The NAIS as planned would require States, producers, and other participating entities to provide information and develop and maintain records. How could we best minimize the burden associated with these requirements? For example, should both the seller and the buyer of a specific group of animals report the movement of the animals, or is reporting by one party adequate?

**Both buyer and seller must keep records of the transaction. Reporting all information in these records is a logistical mountain that is not necessary to climb. Any reporting should be up to producers unless it is required by a specific disease control program (as opposed to a general requirement that all NAIS data be reported).**

How should a private database system be funded? Please give the reasons for your response.

**The premise and animal identification portions of NAIS should be funded by USDA and the states. Individual producers should be responsible for keeping and maintaining records for their production systems. If industries decide a live tracking database is needed for marketing advantage, they can apply for competitive economic development grants. Private databases for tracking are resource intense and better serve the needs of the industries.**

Thank you in advance for your time and consideration of our responses.

Sincerely,

Bret D. Marsh, D.V.M.  
Indiana State Veterinarian